



Kara Kapke  
(317) 231.6491  
kara.kapke@btlaw.com

11 S. Meridian Street  
Indianapolis, IN 46204-3535 U.S.A.  
(317) 236-1313  
Fax (317) 231-7433  
  
www.btlaw.com

June 29, 2023

Chambers of Hon. Robert B. Kugler  
United States District Court for the District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th and Cooper Streets  
Camden, New Jersey 08101

Special Master the Honorable Thomas Vanaskie  
Stevens & Lee  
1500 Market Street, East Tower  
18<sup>th</sup> Floor  
Philadelphia, PA 19103

RE: *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation*  
United States District Court for the District of New Jersey, Case No.: 1:19-md-2875

Dear Judge Kugler and Special Master Vanaskie:

On behalf of Defendants Albertson's LLC, CVS Pharmacy, Inc., Express Scripts, Inc., Humana Pharmacy, Inc., Kroger Co., OptumRX, Rite Aid Corp., Walgreen Co., and Walmart Inc. (collectively, the "Retail Pharmacy Defendants"), please find enclosed a proposed order regarding a proposed discovery schedule for all losartan and irbesartan discovery and outstanding valsartan discovery, directed to the Retail Pharmacy Defendants.

As noted in the Proposed Order, the Retail Pharmacy Defendants submit this proposed schedule without waiving any objections and without prejudice to their ability to seek relief from this schedule if there are unforeseen difficulties or delays.

Plaintiffs' counsel has reviewed this letter and the proposed order and consents to this submission.

Thank you once again for your consideration of these issues.

Respectfully submitted,

  
Kara Kapke